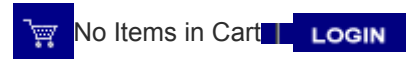


EXHIBIT A



Civil Docket Report

A \$5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID: 200602061
Case Caption: FORTE VS AGUSTA WESTLAND PHILADELPHIA CORPORATION
Filing Date: Tuesday , June 30th, 2020
Court: MAJOR JURY-EXPEDITED
Location: City Hall
Jury: JURY
Case Type: EMPLOYMENT, WRONGFUL DISCHARGE
Status: WAITING TO LIST CASE MGMT CONF

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case motions





No case motions were found.

Case Parties


Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	LEVKO, CHRISTA
Address:	1628 JOHN F KENNEDY BLVD SUITE 1650 PHILADELPHIA PA 19103 (215)475-3517	Aliases:	none	
2	1		PLAINTIFF	FORTE, DANIEL
Address:	400 HAZELNUT CT APT H BEL AIR MD 21015	Aliases:	none	
3			DEFENDANT	AGUSTA WESTLAND PHILADELPHIA CORPORATION

Address:	3050 RED LION ROAD PHILADELPHIA PA 19114	Aliases:	none	
4			TEAM LEADER	NEW, ARNOLD L
Address:	606 CITY HALL PHILADELPHIA PA 19107 (215)686-7260	Aliases:	none	

Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
30-JUN-2020 11:07 AM	ACTIVE CASE			02-JUL-2020 11:10 AM
Docket Entry:	E-Filing Number: 2006045161			
30-JUN-2020 11:07 AM	COMMENCEMENT CIVIL ACTION JURY	LEVKO, CHRISTA		02-JUL-2020 11:10 AM
Documents:	 Click link(s) to preview/purchase the documents Final Cover			 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	none.			
30-JUN-2020 11:07 AM	COMPLAINT FILED NOTICE GIVEN	LEVKO, CHRISTA		02-JUL-2020 11:10 AM
Documents:	 Click link(s) to preview/purchase the documents Forte, Daniel - Complaint .pdf Ex A.pdf Ex B.pdf Ex C.pdf			 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.			
30-JUN-2020 11:07 AM	JURY TRIAL PERFECTED	LEVKO, CHRISTA		02-JUL-2020 11:10 AM
Docket Entry:	12 JURORS REQUESTED.			

30-JUN-2020 11:07 AM	WAITING TO LIST CASE MGMT CONF	LEVKO, CHRISTA		02-JUL-2020 11:10 AM
Docket Entry:	<i>none.</i>			
12-AUG-2020 10:48 AM	PRAECIPE TO REINSTATE CMPLT	LEVKO, CHRISTA		12-AUG-2020 10:55 AM
Documents:	<p>Click link(s) to preview/purchase the documents Praecipe to Reinstate Complaint 8.12.20.pdf 1 - Complaint.pdf</p>			
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF DANIEL FORTE)			

 Click HERE to purchase all documents related to this one docket entry

[▶ Case Description](#)

[▶ Related Cases](#)

[▶ Event Schedule](#)

[▶ Case Parties](#)

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IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA

Filed and Attested by the
Office of Judicial Records
10 AUG 2020 10:48 am
MS. BRIST

DANIEL J. FORTE,

CIVIL DIVISION

Plaintiff,

Case No.

v.

**AGUSTAWESTLAND PHILADELPHIA
CORP.,**

COMPLAINT

Defendant.

Filed on Behalf of the Plaintiff:
DANIEL J. FORTE

JURY TRIAL DEMANDED

COUNSEL OF RECORD THIS PARTY:

Christa Levko, Esq.
PA ID No. 322042

Ruppert Manes Narahari, LLC
1628 JFK Blvd., Suite 1650
Philadelphia, PA 19103
Direct: (215) 475-3517
Fax: (215) 475-3550
cl@rmn-law.com

To the within Defendants,

You are hereby notified to plead to the enclosed Complaint within twenty (20) Days from the date of service hereof or a judgment may be entered against you.

RCVD 17 AUG 2020

IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA COUNTY, PENNSYLVANIA

DANIEL J. FORTE,

CIVIL DIVISION

Plaintiff,

Case No.

v.

**AGUSTAWESTLAND PHILADELPHIA
CORP.,**

Defendant.

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Philadelphia Bar Association
1101 Market Street
Philadelphia, PA 19107
215-238-6333**

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA

DANIEL J. FORTE,

CIVIL DIVISION

Plaintiff,

Case No.

v.

**AGUSTAWESTLAND PHILADELPHIA
CORP.,**

Defendant.

COMPLAINT

NOW COMES the Plaintiff, Daniel J. Forte, by and through his attorney, Christa Levko, Esq., of Ruppert Manes Narahari LLC, and files this Complaint alleging as follows:

JURISDICTION AND VENUE

1. This court has jurisdiction over Forte's claims arising pursuant to the Criminal History Record Information Act ("CHRIA").
2. This court has personal jurisdiction over Defendant, as it maintains minimum contacts and a regular place of business within the Commonwealth of Pennsylvania.
3. Venue is proper in Philadelphia County as Defendant maintains a regular place of business within Philadelphia, and nearly all events giving rise to this Complaint took place in Philadelphia County.

PARTIES

4. Plaintiff, Daniel J. Forte, is an adult individual with a primary residence located at 400 Hazelnut Ct Apt H, Bel Air, MD 21015.

5. Defendant, AgustaWestland Philadelphia Corporation (“AWPC”) is a Pennsylvania business corporation with a regular place of business located at 3050 Red Lion Road, Philadelphia, PA 19114.

FACTS

6. The averments contained in the preceding paragraphs are incorporated herein as though set forth at length.

7. In 2017, Plaintiff was charged with crimes in Harford County, Maryland. These charges arose out of a lengthy and contentious divorce. As of October 25, 2018 the disposition of the actions is listed as “Probation Before Judgment – Unsupervised.”

8. Plaintiff’s plea did not subject him to any misdemeanor or felony convictions.

9. Plaintiff sent his resume to Defendant through a corporate recruiting firm, NorthStar, on April 8, 2019.

10. At the time Plaintiff’s resume was submitted to Defendant for a position as a Senior Contracts Manager, he had considerable experience in a substantially similar role: negotiating, managing, and administering government contracts, both domestic and international.

11. Plaintiff disclosed to Craig Pickens, president of NorthStar, the disposition of Plaintiff’s charges and his probation before judgment.

12. Plaintiff attended a phone interview with Defendant on May 2, 2019.

13. Plaintiff attended an in-person interview on June 14, 2019.

14. Defendant offered Plaintiff a position as Senior Contracts Manager on July 3, 2019, conditional on a drug test and a background check, with a start date of August 5, 2019.

15. Plaintiff accepted this offer on July 5, 2019.

16. Plaintiff authorized a pre-employment background check and submitted to a drug test on July 17, 2019.

17. Plaintiff received an email on July 24, 2019, from Stacy Lavin, that information had been flagged during his background check that “may influence [Plaintiff’s] eligibility to be hired.” SEE ATTACHED EXHIBIT A.

18. Plaintiff received an additional letter from ADP on July 24, 2019 stating that AWPC may take adverse action based on the findings of their background report check. SEE ATTACHED EXHIBIT B.

19. Plaintiff responded to Ms. Lavin on July 29, 2019 and informed her that the items on his background report reflected rightly that he held no convictions for a felony nor misdemeanor.

20. Plaintiff provided a letter to Ms. Lavin from his attorney, Judson Arnold, Esq., affirming that he had no felony nor misdemeanor conviction relating to the items on Plaintiff’s background report. SEE ATTACHED EXHIBIT C.

21. Despite the lack of criminal convictions in Plaintiff’s record, Janice Gerold sent Plaintiff an email on August 25, 2019, stating that AWPC “had decided not to offer [Plaintiff] employment based in whole or in part in the information contained in [his] background check” and the fact that the underlying conduct rendered him unqualified for the position.

CAUSES OF ACTION
Count I – Violation of CHRIA

22. The averments contained in the preceding paragraphs are incorporated herein as though set forth at length.

23. CHRIA's provisions state that felony and misdemeanor convictions may be considered by the employer only to the extent to which they relate to the applicant's suitability for employment in the position for which he has applied. 18 Pa.C.S.A. § 9101 *et seq.*

24. Defendant violated CHRIA by rescinding its offer of employment due to Forte's 2017 entry of probation before judgment.

25. Defendant's actions directly and proximately caused Forte damages in lost income and lost opportunities.

WHEREFORE, Plaintiff respectfully demands judgment in his favor and against Defendant, and the awarding of all damages available for a violation of the Criminal History Record Information Act, including lost wages, consequential damages, compensatory damages, attorney's fees, and any other relief which the court deems just and proper, in law or in equity, in excess of arbitration limits.

Respectfully Submitted,



Christa Levko, Esq.
PA ID No. 322042

Ruppert Manes Narahari, LLC
1628 JFK Blvd., Suite 1650
Philadelphia, PA 19103
Direct: (215) 475-3517
Fax: (215) 475-3550
cl@rmn-law.com

VERIFICATION

I, Daniel J. Forte, make this verification and state the averments of fact set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

I understand that the statements therein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Daniel J. Forte

Date

Exhibit A

Cc: janicem.gerold@leonardocompany.com

Subject: RE: Daniel Forte - AugustaWestInd Phil/Corp/AGU002 Employment Screening Information

Daniel,

Good afternoon.


We received your background report and there was an item that was flagged on the report that may influence your eligibility to be hired. We are going through our normal process for reviewing a result such as this. ADP notified me that a letter and copy of the background report was mailed out to you yesterday so you should receive it in the next few business days. This letter contains all the instructions for you to follow up regarding the flagged item on the report.

We thank you for your flexibility as we work through this process. Pending the outcome of the process, we would like to set a tentative start date as August 19, 2019.

Thank you and have a good evening,

Stacy Lavin

Exhibit B

 Screening and
Selection Services

July 24, 2019



¹⁴ Daniel John Forte
162 Razor Strap Rd
North East MD 21901-2714

Dear Applicant:

ADP Screening and Selection Services, Inc. (ADP SASS) is sending this notice on behalf of Agustawestland Philadelphia (the "Company"), who ordered a background check report and/or a Pembroke Drug Test report, with your authorization, in connection with your application for employment with the Company. Enclosed is a copy of the report(s) and a summary of your rights under applicable law(s). We were informed that the Company may take adverse action based in whole or in part on the information contained in the report(s).

Please carefully review the report(s). If you believe that any of the information is inaccurate or incomplete, or if you have any other concerns about the information in the report(s), you may contact the appropriate company as designated below.

For background check reports: Contact ADP SASS, located at 301 Remington Street, Fort Collins, CO 80524, 888-606-7868. You may file a dispute by mail or fax, online at www.adpselect.com under the Applicant Resources section, or by calling the toll free number listed above. A consumer dispute form is enclosed for your convenience if you wish to send your dispute by mail or fax. Please contact ADP SASS no later than August 05, 2019. Should you file a dispute with respect to any information in the report, ADP SASS will notify the Company.

For Pembroke Drug Test Reports (if ordered by the Company): Contact the Medical Review Officer at the phone number listed on the Pembroke Drug Test report.

Sincerely,

On behalf of the Company
ADP Screening and Selection Services, Inc.
Dispute/Compliance Dept.

Enclosure:

Report(s)
Consumer Dispute Form
CFPB Summary of Rights
State Summaries of Rights (if applicable)

LTR1

Case ID: 200602061

Exhibit C



SILVERMAN|THOMPSON|SLUTKIN|WHITE
ATTORNEYS AT LAW

A Limited Liability Company

26th Floor
201 North Charles Street
Baltimore, Maryland 21201

Telephone (410) 385-2225
Facsimile (410) 547-2432
www.mdattorney.com

Baltimore Washington DC New York

Writer's Direct Contact:

July 5, 2019

VIA CERTIFIED MAIL

Craig Picken
Northstar Group
1213 Culbreth Drive, Suite 206
Wilmington, NC 28405

Re: Daniel Forte

Dear Mr. Picken,

I represented Daniel Forte in a criminal matter that arose from facts surrounding his contentious divorce proceedings. Mr. Forte was given the benefit of a probation before judgment, which means that he did not receive a criminal conviction. He is entitled to eventually have this completely removed from his record. Though Mr. Forte had numerous legal and factual defenses that could have been pursued, we decided that resolving the case without a trial was the most expeditious approach to protecting his clean criminal record.

Should you have any questions or need any other information, please do not hesitate to contact me.

Regards,

Judson R. Arnold